



February 12, 2018

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Shentel Certification In Support of Pending Petition for Relinquishment of  
ETC Designation; (In re Connect America Fund, WC Docket 10-90)**

Dear Ms. Dortch:

On June 29, 2017, Shenandoah Personal Communications, LLC (“Shentel”) petitioned the Commission for relinquishment of its eligible telecommunications carrier (“ETC”) designation of certain of its predecessors-in-interest, Virginia PCS Alliance, L.C. and Richmond 20 MHz, LLC (together, d/b/a “NTELOS”), in the Commonwealth of Virginia (Study Area Code 199008).<sup>1</sup> The Commission has not yet acted on this Petition.

In support of the pending Petition Shentel hereby supplements the record to certify that all High Cost Universal Service Support disbursed to Shentel and NTELOS in the Commonwealth of Virginia (Study Area Code 199008) since October 1, 2015<sup>2</sup> has been utilized only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as required by Section 254(e) of the Communications Act and Section 54.7 of the Commission’s rules.<sup>3</sup> Until the Commission acts on Shentel’s request to relinquish its ETC designation, Shentel certifies that it will continue to use all High Cost Universal Service Support disbursed to Shentel in the Commonwealth of Virginia (Study Area Code 199008) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as required by Section 254(e) of the Communications Act and Section 54.7 of the Commission’s rules.<sup>4</sup>

Throughout its time as an ETC, Shentel has been committed to the Commission’s mission to make “available ... to all the people of the United States ... a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable

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<sup>1</sup> Shentel Request for Relinquishment of Eligible Telecommunications Carrier Designation, WC Docket No. 09-197 (filed June 29, 2018) (“Petition”).

<sup>2</sup> Shentel’s predecessor, NTELOS, petitioned the Commission for a reduction in the size of its ETC study area in Virginia on October 1, 2015. The Commission has not acted on that petition. *See* NTELOS Petition for Modification of Eligible Telecommunications Carrier Service Area, WC Docket No. 09-197, WC Docket No. 10-90 (filed Oct. 1, 2015); *see also* NTELOS Supplement to Petition for Modification of Eligible telecommunications Carrier Service Area, WC Docket No. 09-197, WC Docket No. 10-90 (filed July 11, 2016).

<sup>3</sup> 47 U.S.C. § 254(e); 47 C.F.R. § 54.7.

<sup>4</sup> *Id.*

charges.”<sup>5</sup> The Certification contained herein is evidence of such commitment. If the Commission has any questions regarding Shentel’s Certification, or Shentel’s pending request to relinquish its ETC designation, please do not hesitate to contact the undersigned.

Respectfully,

A handwritten signature in black ink, appearing to read "Ray B. Ostroski", written in a cursive style.

Raymond B. Ostroski,  
Vice President – Legal and General Counsel

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<sup>5</sup> 47 U.S.C. § 151.